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Attorneys for Defendant and Counterclaim  
Plaintiff SOPHOS INC. and Counterclaim  
Plaintiff SOPHOS LTD.

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

17 FORTINET, INC., a corporation

18 Plaintiff,

19 vs.

20 SOPHOS, INC., a corporation, MICHAEL  
VALENTINE, an individual, and JASON  
CLARK, an individual.

21 Defendants.  
22

23 SOPHOS INC. and SOPHOS LTD.,  
corporations,

24 Counterclaim Plaintiffs,

25 vs.

26 FORTINET, INC., a corporation,

27 Counterclaim Defendant.  
28

Case No. 3:13-cv-05831-EMC

**STIPULATION AND PROPOSED  
ORDER TO EXTEND FACT  
DISCOVERY DEADLINE FOR TWO  
DEPOSITIONS**

1 WHEREAS, the Court set a deadline for fact discovery of June 16, 2015 (Dkt. No. 110);

2 WHEREAS Plaintiff and Counterclaim-Defendant Fortinet, Inc. ("Fortinet") and Defendants  
3 and Counterclaim-Plaintiffs Sophos Inc. and Sophos Ltd. (collectively, "Sophos") have agreed to  
4 depositions of two of Fortinet's Federal Rule of Civil Procedure 30(b)(6) designees, James Bray and  
5 David Finger, after the discovery deadline, due to the scheduling constraints of Messrs. Bray and  
6 Finger;

7 WHEREAS the parties have agreed that Mr. Bray will be deposed on June 17, 2015, beginning  
8 at 9 a.m.;

9 WHEREAS the parties have agreed to a deposition of Mr. Finger on June 18, 2015, beginning  
10 at 9 a.m.;

11 WHEREAS the parties do not seek to extend any other modification to the fact discovery  
12 deadline;

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties that:

14 The parties respectfully request a continuation of the fact discovery deadline for the sole  
15 purpose of the depositions of James Bray on June 17, 2015 and David Finger on June 18, 2015, with  
16 no other modifications to the fact discovery deadline.

1 DATED: June 17, 2015

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

3 By /s/ John M. Neukom

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Attorneys for Plaintiff FORTINET, INC.

9 DATED: June 17, 2015

DLA PIPER LLP (US)

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Attorneys for Defendant and Counterclaim  
Plaintiff SOPHOS INC. and Counterclaim  
Plaintiff SOPHOS LTD.

19 **SIGNATURE ATTESTATION**

20 Pursuant to Local Rule 5.1(i)(3), I attest under penalty of perjury that concurrence in the filing  
21 of this document has been obtained from David Knudson.

23 /s/ Grant N. Margeson

24 Grant N. Margeson

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

FORTINET, INC., a corporation

Plaintiff,

vs.

SOPHOS, INC., a corporation, MICHAEL  
VALENTINE, an individual, and JASON  
CLARK, an individual.

Defendants.

Case No. 3:13-cv-05831-EMC

**[PROPOSED] ORDER EXTENDING  
FACT DISCOVERY DEADLINE FOR  
TWO DEPOSITIONS**

SOPHOS INC. and SOPHOS LTD.,  
corporations,

Counterclaim Plaintiffs,

vs.

FORTINET, INC., a corporation,

Counterclaim Defendant.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.** The fact discovery deadline is  
extended for the sole purpose of the depositions of James Bray on June 17, 2015 and David Finger on  
June 18, 2015, with no other modifications to the fact discovery deadline.

Dated: \_\_\_\_\_, 2015 By: \_\_\_\_\_

HONORABLE EDWARD M. CHEN